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## [Hernandez Team] Meet and confer-chart

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Wed, Mar 9, 2022 at 7:57 PM

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Hi Dara,

I wanted to follow up on the basic commitments on the shape of the chart, just to make sure we're on the same page -- and confirm we agreed Defendants would send the amended chart on Monday (the 14th).

In terms of commitments, here's our understanding of what we agreed to:

- For documents Defendants claim they have already produced, there will be a general description of the documents (e.g., something like, "closed IAB files from Date X to Date Y, for allegations that took place protests on Schedule A"), along with something pointing at where to find it. That "something" will either be Bates numbers, or something else like a volume number -- except that Defendants won't use a volume number if they're pointing to a disproportionately large volume relative to the documents being pointed to. Similarly, videos should just get Bates IDs.
- Defendants will describe both (1) the places for each request where documents may exist that they have declined to search and (2) the documents that they have withheld, across the entire life of the case for every request (that is, this will cover both documents previously withheld and that will be withheld on March 18).
- Defendants will describe what they *will* be producing. Where possible (for example, for things like requests 8 and 9) they will identify documents specifically. Where the request is more general, Defendants will describe where they are searching and the reason for that search (e.g., what sorts of things they expect to find in that place).
- The various requests we discussed specifically will be updated.
- What the Court said about the status of objections vis-a-vis waiver is everyone's understanding (see pp. 9-10 of the transcript).
- You will provide all BWC video for all named defendants in the Gray and other cases by Friday March 18, 2022.

Please let me know right away if any of that is inconsistent with your understanding, so we can either discuss it or go to the Court if we cannot resolve it quickly.

Thank you -- and again, glad you're feeling better.

Yours,

Remy.

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**J. Remy Green**

*Partner*

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On Wed, Mar 9, 2022 at 8:30 AM Weiss, Dara (Law) <[daweiss@law.nyc.gov](mailto:daweiss@law.nyc.gov)> wrote:  
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